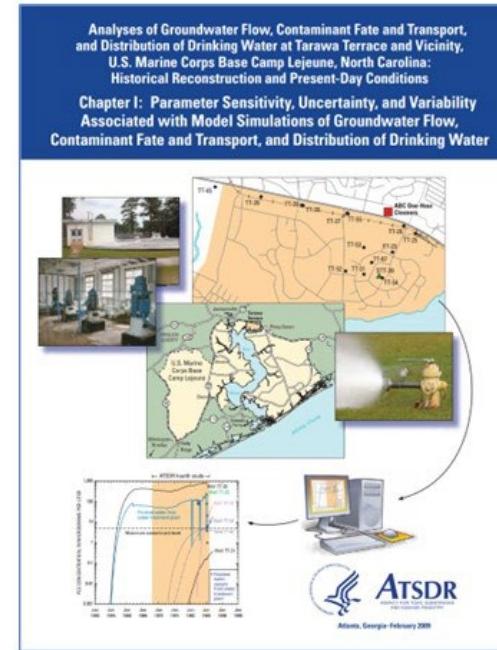


EXHIBIT 2

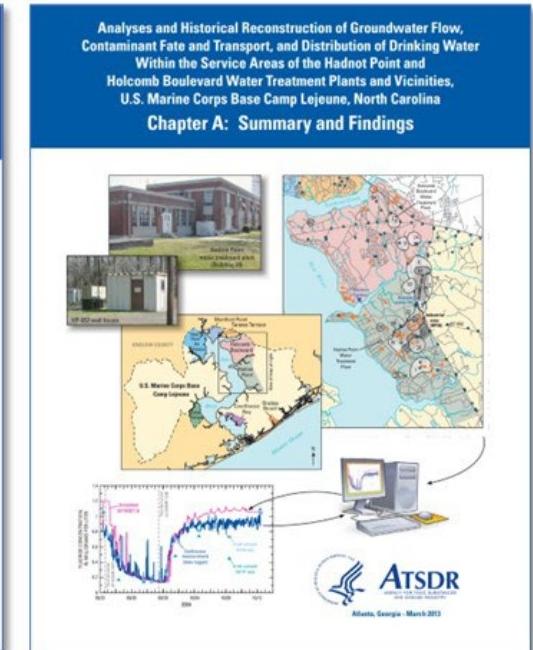
ATSDR Water Model Project

- ATSDR Water Model Project consists of all material associated with the creation of the Tarawa Terrace and Hadnot Point/Holcomb Blvd water models which include:
 - Both site's water model input & output files
 - Geographic Information System (GIS) Project
 - Multiple document collections
 - Research material & other documents/data relied upon to create the models
- The water model projects represent thousands to tens of thousands of individual files

ATSDR Water Model Project



Tarawa Terrace
Water Model

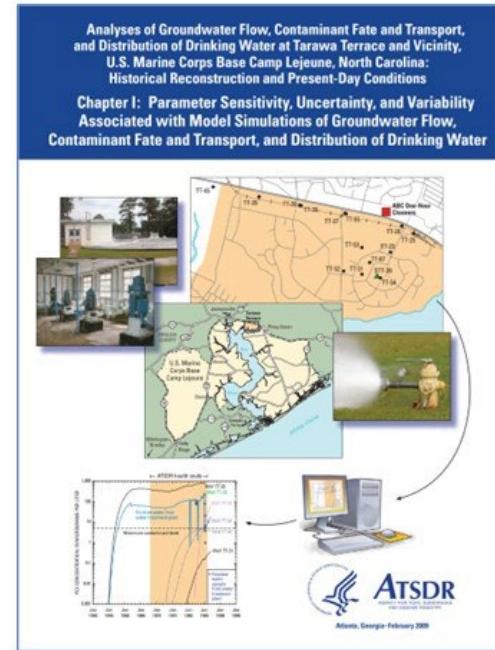


Hadnot Point – Holcomb Blvd
Water Model

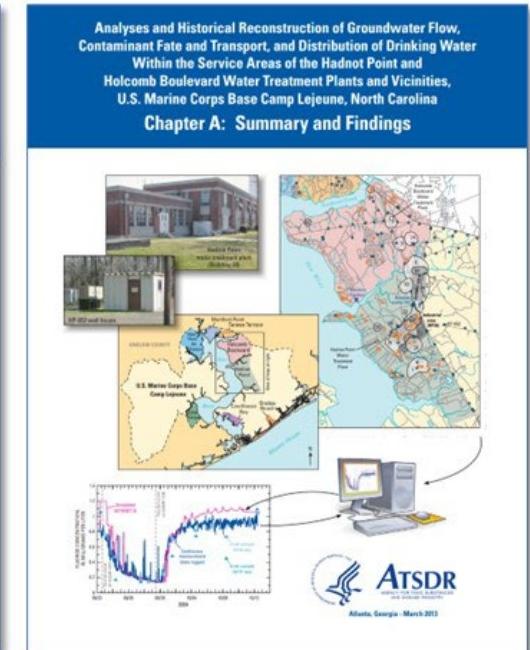
ATSDR Water Model Project

- Plaintiff's consultants and experts need to be able to have access to the ATSDR Water Model Project in its original form to allow them to:
 - Evaluate and fully understand the methodology the ATSDR scientists used in developing the model
 - Evaluate the model's input and output files
- The only way this can be accomplished is to have the Project in its original form

ATSDR Water Model Project

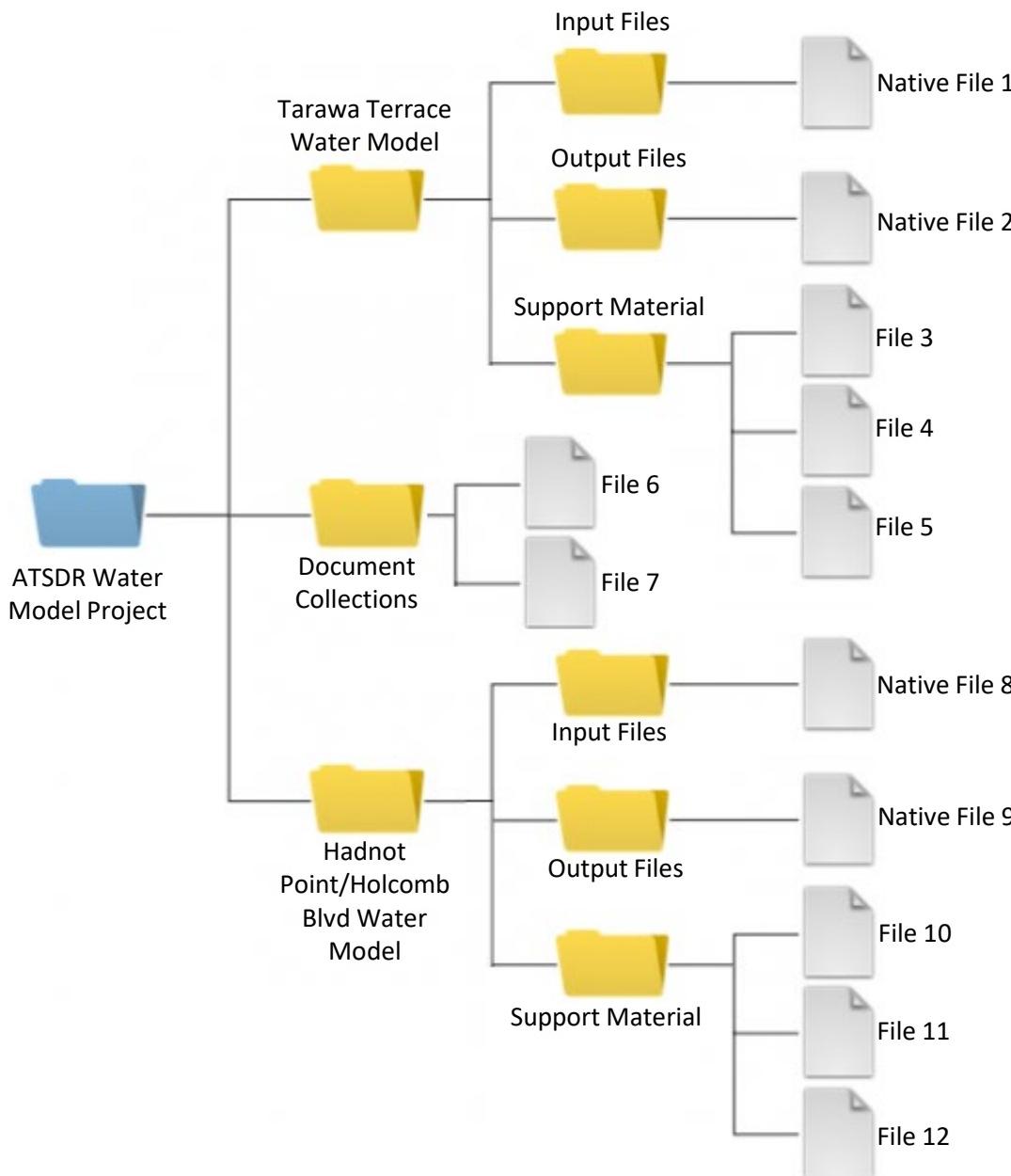


Tarawa Terrace
Water Model

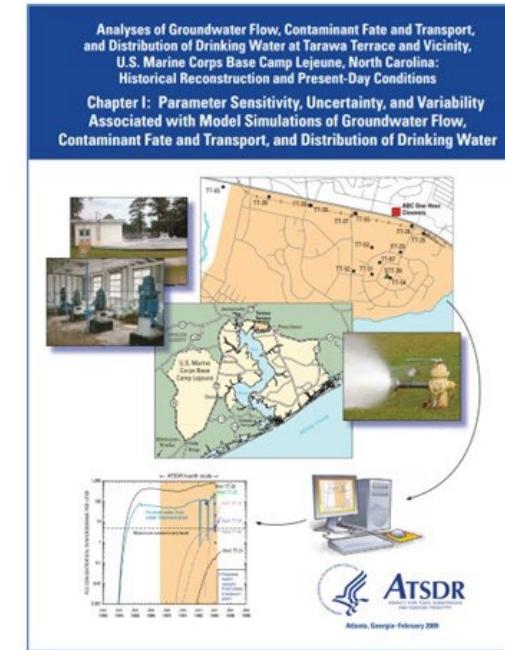


Hadnot Point – Holcomb Blvd
Water Model

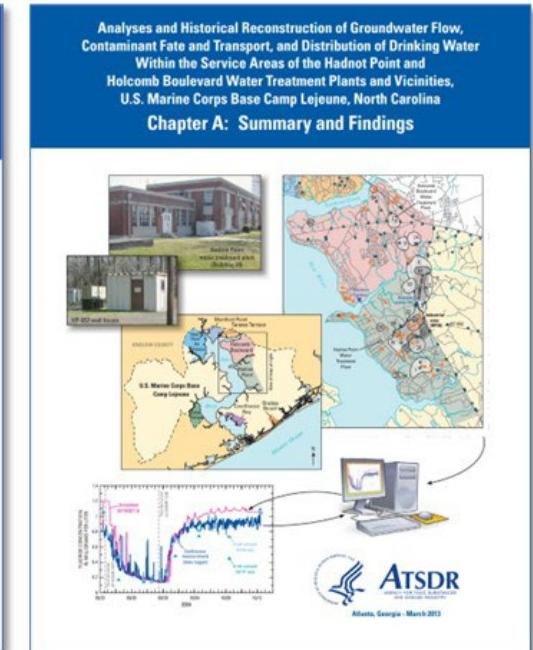
ATSDR Water Model Project



ATSDR Water Model Project



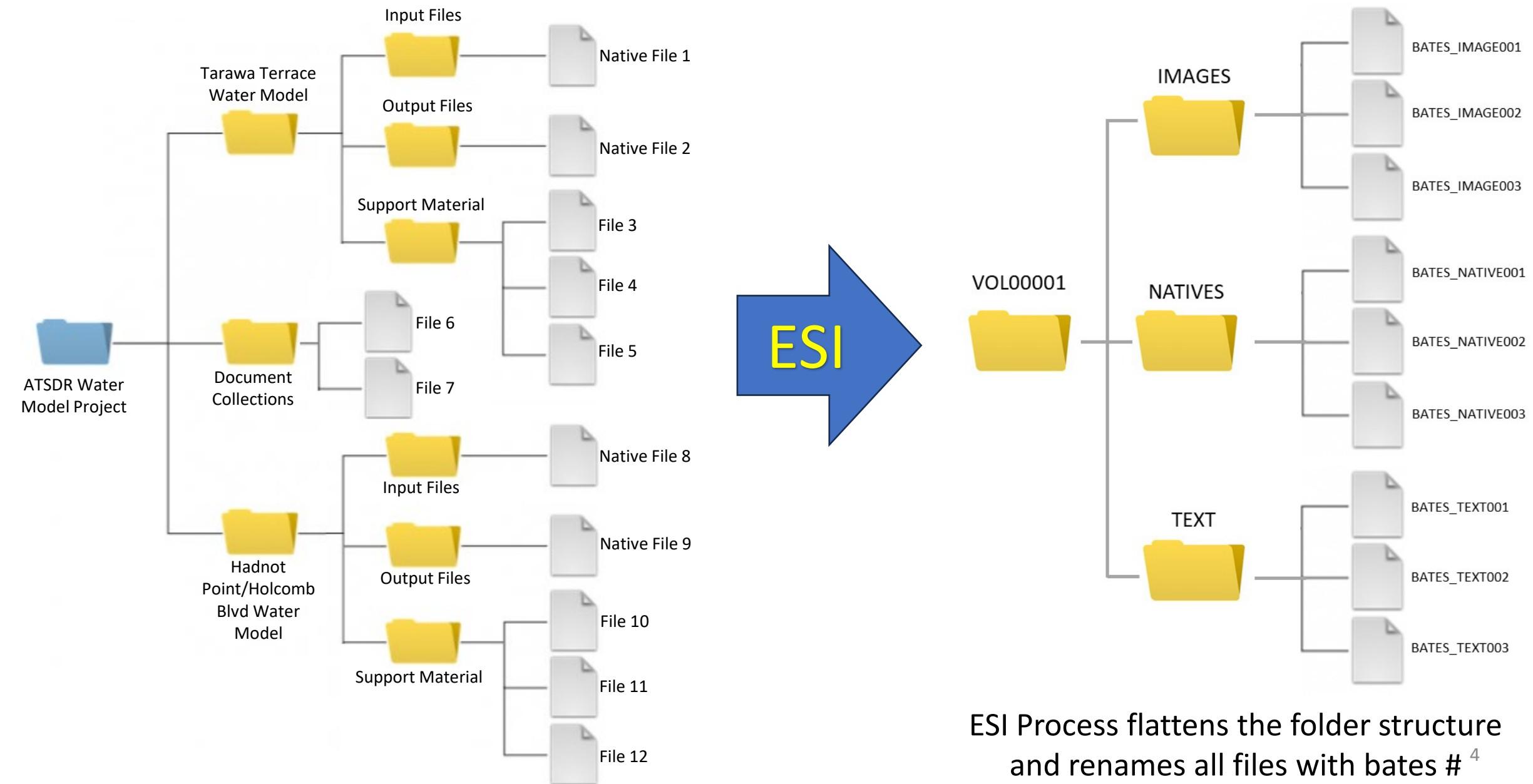
Tarawa Terrace
Water Model



Hadnot Point – Holcomb Blvd
Water Model

The graphic to the left represents the folder-subfolder-file structure of the ATSDR water Model Project. The actual structure will be much more extensive. 3

ATSDR Water Model Project



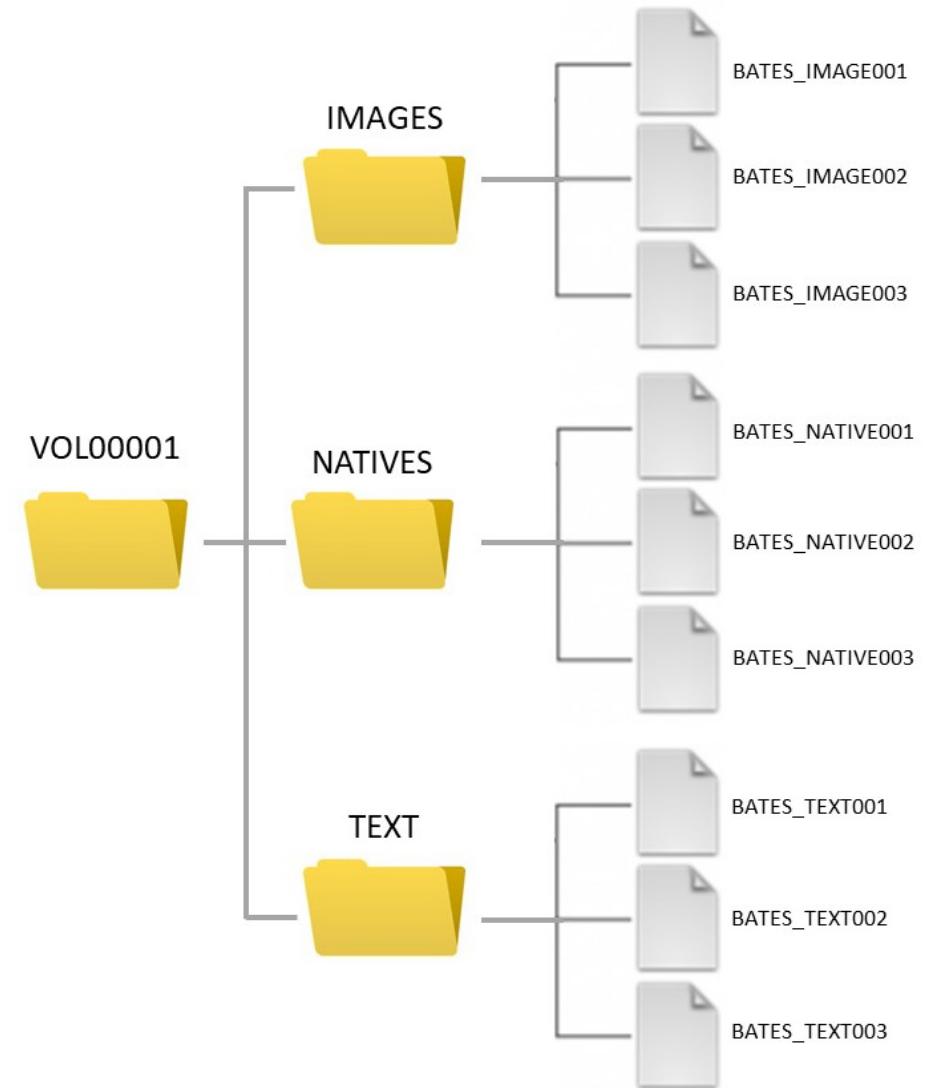
ATSDR Water Model Project

BEGDOC#	FILENAME
CLJA_WATERMODELING-0000000001	ChA FigA4.1_TCE HPIA layer1.pdf
CLJA_WATERMODELING-0000000002	Table1_ResultsSummary (002).docx
CLJA_WATERMODELING-0000000003	ChA FigA16.pdf
CLJA_WATERMODELING-0000000004	ChA FigA17.pdf
CLJA_WATERMODELING-0000000005	ChA FigA6.1_TCE HP landfill layer1.pdf
CLJA_WATERMODELING-0000000006	ChD FigD7-8_Bldg645 benzene USTP.pdf
CLJA_WATERMODELING-0000000008	ChA Fig13-14.pdf
CLJA_WATERMODELING-0000000010	ChA FigA5.1_benzene HPIA layer1.pdf
CLJA_WATERMODELING-0000000011	Camp Lejeune SVI_20170717.docx
CLJA_WATERMODELING-0000000012	ChA Sup3 FigS3.21_Pot surface.pdf
CLJA_WATERMODELING-0000000013	ChA FigA6.4_PCE HP landfill layer1.pdf

Bates File Name

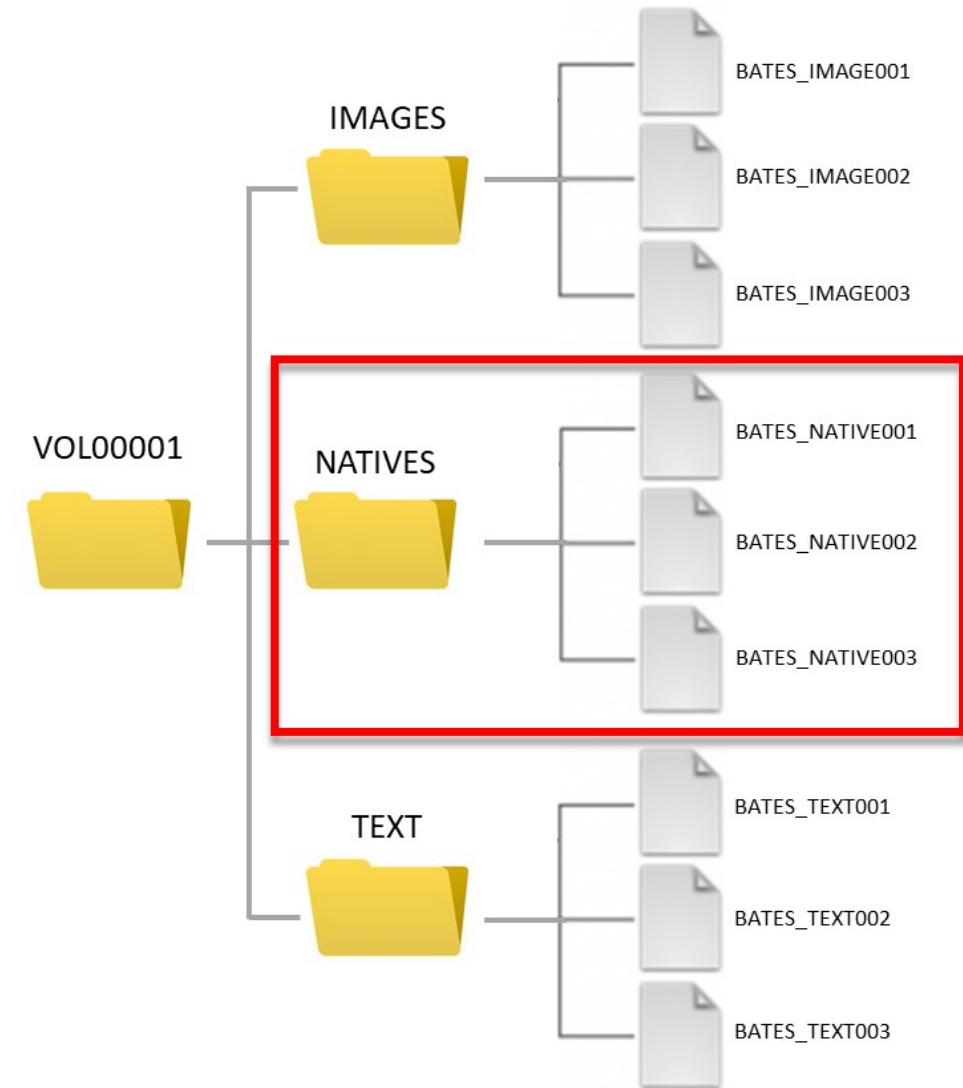
Original File Name

All project files are renamed according the bates prefix and numbering sequence. Native files would retain their file extensions.



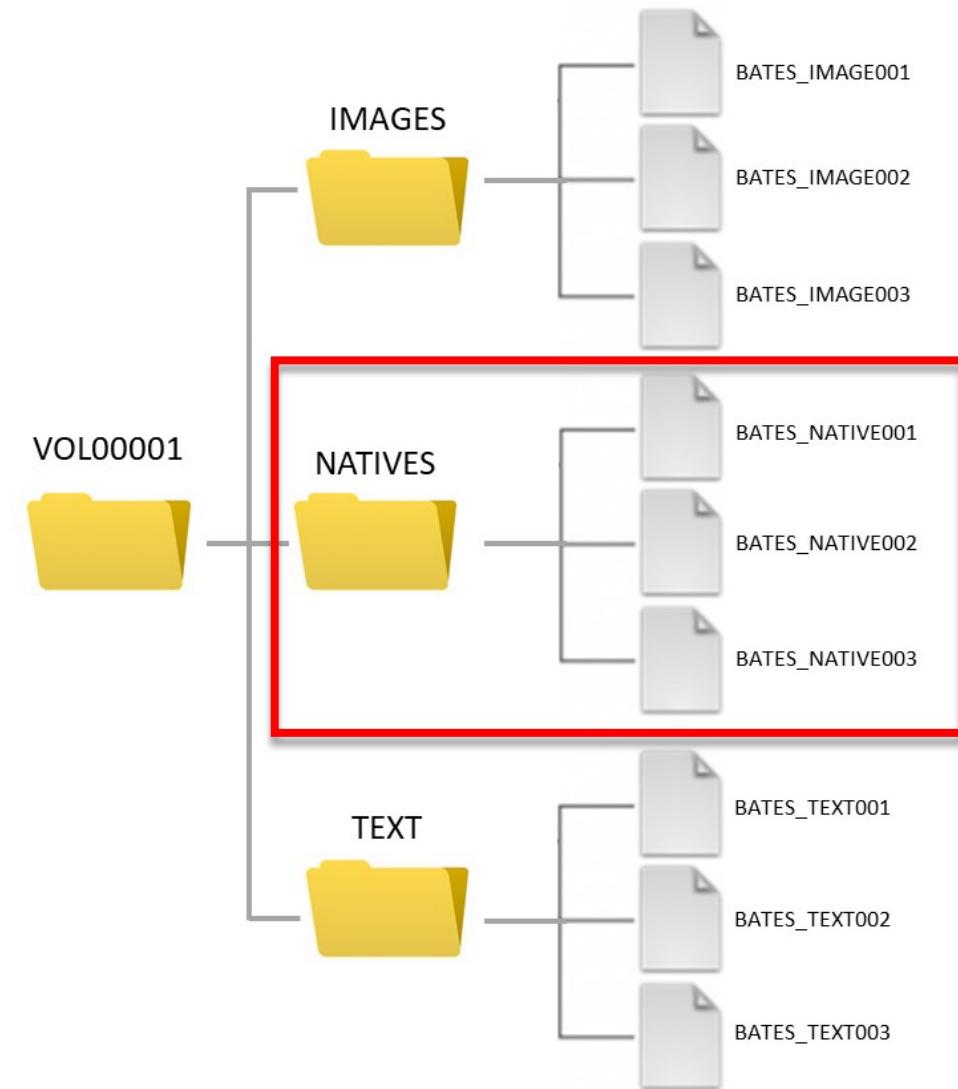
ATSDR Water Model Project

- Both parties agree the ATSDR Water Model Project should be processed according to the agreed upon ESI protocol
- Both parties agree the ESI Process will preserve the native file formats (file extensions)
- Both parties agree the ESI process will rename all native files and group them under a common “Native” folder
- Both parties agree the native files after being renamed and moved will not retain any links or other file/project associations they may have had



ATSDR Water Model Project

- The DOJ suggests that since the ESI process retains the native format all the plaintiffs' experts have to do is to access the new bates versions of each native file to do their analysis
- This is not accurate. Each native file is linked to the project file and other data files by name and location. Since the name and location have been changed those links are broken and would have to be relinked for the project be usable.
- This is not practical since the number of associations and links in projects of this type will range in the thousands to tens of thousands.



Native Project Demonstration

Geographic Information Systems (GIS)

ArcGIS Pro Tutorial (<https://pro.arcgis.com/en/pro-app/latest/get-started/create-a-project.htm>)

Screenshot of the ArcGIS Pro "Create a project" tutorial page:

The page title is "Create a project—ArcGIS Pro". The URL is <https://pro.arcgis.com/en/pro-app/latest/get-started/create-a-project.htm>. The top navigation bar includes links for Products, Industries, Support & Services, Stories, About, Overview, Extensions, Features, Resources (selected), Free Trial, and Pricing.

The main content area has a breadcrumb trail: Get Started / Quick-start tutorials / Learn the basics. A search bar is at the top right.

The left sidebar under "ArcGIS Pro quick-start tutorials" shows the following sections:

- Learn the basics
 - Introducing ArcGIS Pro
 - Create a project (selected)
 - Add data to a project
 - Explore data
 - Author a map
- Visualize
- Manage and edit data
- Analyze
- Share

The main content area features a large heading "Create a project" and a sub-section "Overview". It includes a screenshot of the ArcGIS Pro interface showing a map of a study area with a cyan boundary and a red play button icon. The interface toolbar is visible at the top of the map window.

The "In this topic" sidebar on the right lists the following steps:

- Overview
- Create a project from a default template
- Locate the study area
- Add wilderness data to the map
- Make a layer from a selected feature
- Add critical habitat data to the map
- Clip the critical habitat layer
- Symbolize the layer

A callout box in the bottom right corner states: "Tutorial project was created to demonstrate importance of maintaining file names and locations in the ATSDR Water Modeling Project".

Page number 9 is located in the bottom right corner of the callout box.

Completed Tutorial in ArcGIS

The screenshot displays the ArcGIS desktop application interface. The main window shows a satellite map of the San Gorgonio area, featuring a large green polygon representing the San Gorgonio Wilderness and several smaller red and orange polygons representing critical habitat areas. A red bounding box highlights the left side of the interface, encompassing the top ribbon toolbar, the left panel (Contents), and the bottom-left panel (Drawing Order). The ribbon toolbar at the top includes tabs for Project, Map, Insert, Analysis, View, Edit, Imagery, Share, Help, and Graphics. The left panel (Contents) lists project items: San Gorgonio, Critical habitat, San Gorgonio Mountain, San Gorgonio Wilderness - For..., and World Imagery. The bottom-left panel (Drawing Order) shows the same list of items with the 'San Gorgonio' layer currently selected. The right side of the interface features a Catalog pane displaying the project structure, including Maps, Toolboxes, Databases, Styles, Folders, and Data. A callout box in the bottom right corner provides a detailed description of the highlighted layers.

The red bounding box shows the different layers that are part of the project. The layers in this tutorial are the background (map), outline and the location marker.

10

Layer Data Sources

The screenshot shows the ArcGIS Pro interface with a satellite map of San Gorgonio. A layer named "CriticalHabitat" is selected in the Contents pane. The "Layer Properties" dialog is open, specifically the "Source" tab, which displays the database information for the layer.

Layer Properties: CriticalHabitat

Source

Data Type	File Geodatabase Feature Class
Database	C:\Create a project Tutorial\San Gorgonio.gdb
Name	CriticalHabitat
Alias	CriticalHabitat
ObjectID	32-bit
Feature Type	Simple
Geometry Type	Polygon

Database C:\Create a project Tutorial\San Gorgonio.gdb

Catalog

- Project Portal Computer Favorites
- Maps
- Toolboxes
- Databases
 - San Gorgonio.gdb
 - CriticalHabitat
- Styles
- Folders
 - Create a project Tutorial
 - Data
 - Create_a_project.gdb
 - SoCalCriticalHabitat.lyrx
 - Wilderness Areas in the United States.lyrx
- Locators

The GIS software program creates a database where the data related to the layers are stored. The stored data includes the file name and folder/path information.

Layer Data Sources

San Gorgonio Command Search (Alt+Q)

Project Map Insert Analysis View Edit Imagery Share Help Graphics Feature Layer Labeling Data

Cut Copy Paste Copy Path Explore Bookmarks Go to XY Basemap Add Graphics Layer Add Data Select By Attributes Measure Locate Infographics Coordinate Conversion Select By Data Selection Inquiry Labeling Offline

Clipboard

Contents Search Drawing Order

San Gorgonio

- San Gorgonio
- CriticalHabitat
- Common Name
 - California taraxacum
 - Mountain yellow-legged frog
 - Southwestern willow flycatcher
- San Gorgonio Mountain
- San Gorgonio Wilderness - Forest Service
- World Imagery

Layer Properties: San Gorgonio Wilderness - Forest Service

This layer comprises a subset of features. To access all features in the source data, clear the selection from the Selection tab.

Source

Data Source

Data Type: File Geodatabase Feature Class

Database: C:\Create a project Tutorial\Data\Create_a_project.gdb

Name: National_Wilderness_Preservation_System

Alias: National_Wilderness_Preservation_System

ObjectID: 32 bit

Set Data Source...

General Metadata Selection Display Cache Definition Query Time

Extent

Spatial Reference

OK Cancel

Catalog

Project Portal Computer Favorites

Search Project

Maps

- San Gorgonio

Toolboxes

Databases

- San Gorgonio.gdb
 - CriticalHabitat

Styles

Folders

- Create a project Tutorial
 - Data
 - Create_a_project.gdb
 - SoCalCriticalHabitat.lyrx
 - Wilderness Areas in the United States.lyrx

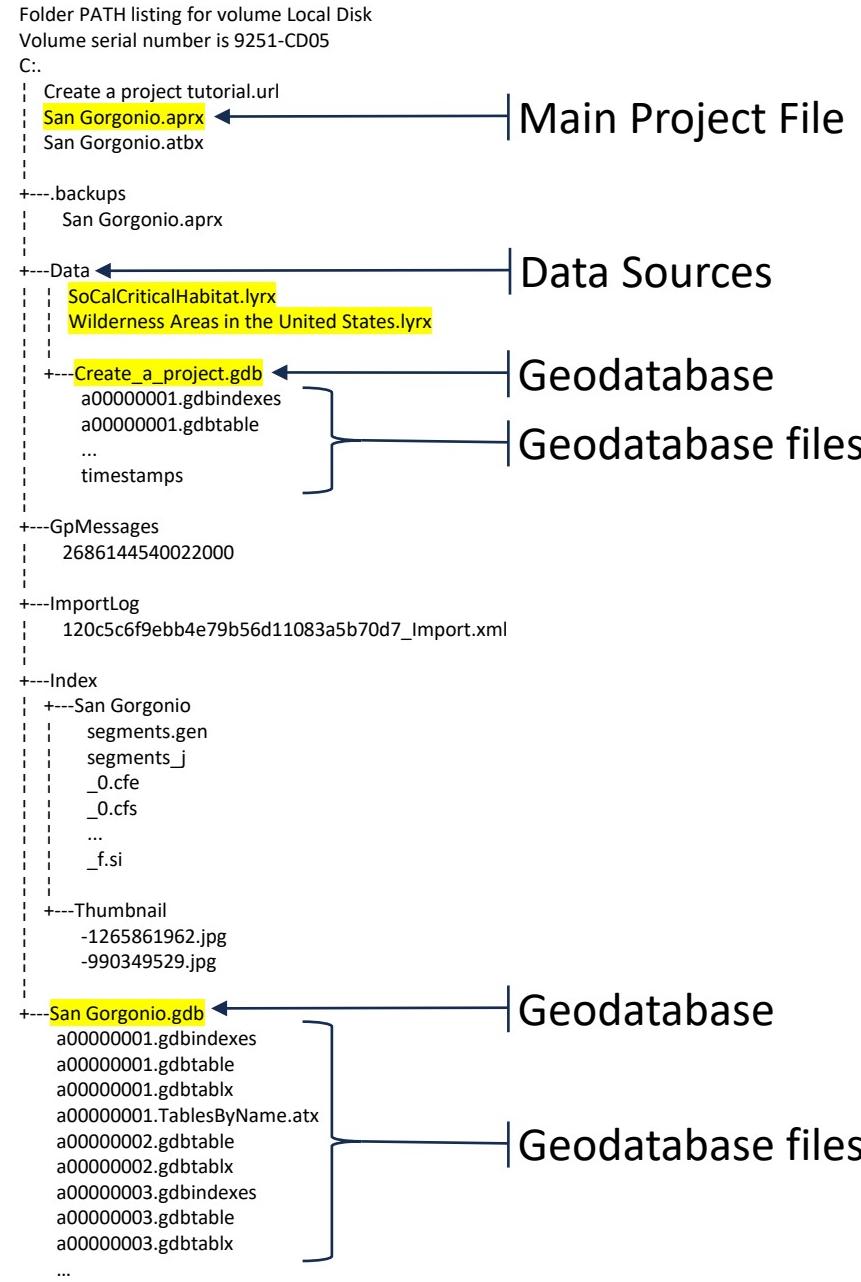
Locators

San Gorgonio

1:205,020 117.2070352°W 34.1532654°N Selected Features: 0

12

Tutorial File Tree



This is the folder/file tree for the tutorial project showing the file locations (folders) and the numerous files created in this simple project.

Project Files Renamed and File Structure Flattened (typical ESI production)

Folder PATH listing for volume Local Disk
Volume serial number is 9251-CD05

C:.

- | Create a project tutorial.url
- | San Gorgonio.aprx
- | San Gorgonio.atbx

+---.backups

- | San Gorgonio.aprx

+---Data

- | SoCalCriticalHabitat.lyrx
- | Wilderness Areas in the United States.lyrx

+---Create_a_project.gdb

- | a00000001.gdbindexes
- | a00000001.gdbtable
- ...
| timestamps

+---GpMessages

- | 2686144540022000

+---ImportLog

- | 120c5c6f9ebb4e79b56d11083a5b70d7_Import.xml

+---Index

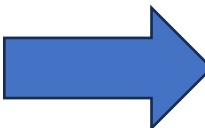
- | +---San Gorgonio
- | | segments.gen
- | | segments_j
- | | _0.cfe
- | | _0.cfs
- | | ...
| | _f.si

+---Thumbnail

- | -1265861962.jpg
- | -990349529.jpg

+---San Gorgonio.gdb

- | a00000001.gdbindexes
- | a00000001.gdbtable
- | a00000001.gdbtablx
- | a00000001.TablesByName.atx
- | a00000002.gdbtable
- | a00000002.gdbtablx
- | a00000003.gdbindexes
- | a00000003.gdbtable
- | a00000003.gdbtablx



Folder PATH listing for volume Local Disk
Volume serial number is 9251-CD05

C:.

- | bates_00000000.jpg
- | bates_00000001.jpg
- | bates_00000002.xml
- | bates_00000003
- | bates_00000004.gdbindexes
- | bates_00000005.gdbtable
- | bates_00000006.gdbtablx
- | bates_00000007.gdbindexes
- | bates_00000008.gdbtable
- | bates_00000009.gdbtablx
- | bates_00000010.atx
- | bates_00000011.atx
- | bates_00000012.gdbtable
- | bates_00000013.gdbtablx
- | bates_00000014.gdbtable
- | bates_00000015.gdbtablx
- | bates_00000016.gdbindexes
- | bates_00000017.gdbtable
- | bates_00000018.gdbtablx
- | bates_00000019.gdbindexes
- | bates_00000020.gdbtable
- | bates_00000021.gdbtablx
- | bates_00000022.freelist
- | bates_00000023.gdbindexes
- | bates_00000024.gdbtable
- | bates_00000025.gdbtablx
- | bates_00000026.horizon
- | bates_00000027.spx
- | bates_00000028.atx
- | bates_00000029.atx
- | bates_00000030.atx
- | bates_00000031.atx
- | bates_00000032
- | bates_00000033
- | bates_00000034
- | bates_00000035
- | bates_00000036
- | bates_00000037
- | bates_00000038
- | bates_00000039
- | bates_00000040
- | bates_00000041
- | bates_00000042
- | bates_00000043
- | bates_00000044.atx
- ...

The ESI creation process renames the files according a bates number and relocates the files to different folders.

Before ESI Processing

San Gorgonio

Command Search (Alt+Q)

timothy WISAI

Project Map Insert Analysis View Edit Imagery Share Help Graphics

Cut Copy Paste Copy Path Clipboard Explore Bookmarks Go To XY Basemap Add Graphics Layer Add Data Layer

Select By Attributes Select By Location Attributes Measure Locate Infographics Coordinate Conversion Clear Pause Lock View Unplaced Convert More Download Map Sync Remove Labeling Offline

Contents Search Drawing Order San Gorgonio Critical habitat Common Name California taraxacum Mountain yellow-legged frog Southwestern willow flycatcher San Gorgonio Mountain San Gorgonio Wilderness - For... World Imagery

San Gorgonio

1:205,020 116.77668272°W 34.2426248°N Selected Features: 0

Catalog Project Portal Computer Favorites

Search Project

Maps San Gorgonio Toolboxes Databases San Gorgonio.gdb CriticalHabitat Styles Folders Create a project Tutorial Data Create_a_project.gdb SoCalCriticalHabitat.lyrx Wilderness Areas in the United States.lyrx Locators

If the pre-ESI project is compared to the Post-ESI it is clear that the ESI process file name and location changes will cause the project to have numerous errors.

15

After ESI Processing: Missing Layers

The screenshot shows the ArcGIS Pro application interface. The main window displays a satellite map of San Gorgonio Mountain, California. A red box highlights the 'Contents' pane on the left side of the interface. The 'Contents' pane lists several layers:

- San Gorgonio
- Critical habitat (selected)
- Click to repair layer's data source:
 - California taraxacum
 - Mountain yellow-legged frog
 - Southwestern willow flycatcher
- San Gorgonio Mountain
- ! San Gorgonio Wilderness - F...
- World Imagery

The 'Map' tab is selected in the ribbon menu. The 'Catalog' pane on the right shows project items like Maps, Toolboxes, Databases, Styles, Folders, and Locators.

Broken links will be created when the project file names and locations are changed which will be flagged when trying to open the project.

16

After ESI Processing: Missing Layers

The red ! Indicate layers where the link to the source file or data is broken. In order to repair the project each link would have to be restored.

17

After ESI Processing: Missing Layers

The screenshot shows the ArcGIS Pro interface with a map of San Gorgonio. A red box highlights the left panel, which includes a 'Contents' pane with a search bar and a 'Drawing Order' list. The 'Drawing Order' list shows several layers: 'San Gorgonio' (unchecked), 'CriticalHabitat' (checked and highlighted in blue), 'San Gorgonio Mountain' (checked), 'San Gorgonio Wilderness - F...' (checked), and 'World Imagery' (checked). A second red box highlights the 'CriticalHabitat' layer in the 'Drawing Order' list. A third red box highlights the 'Contents' pane. The right side of the screen shows a large map view and a 'Catalog' pane.

Contents

Search

Drawing Order

- San Gorgonio
- CriticalHabitat

Click to repair layer's data source.

- California taraxacum
- Mountain yellow-legged frog
- Southwestern willow flycatch...

- San Gorgonio Mountain
- ! San Gorgonio Wilderness - F...
- World Imagery

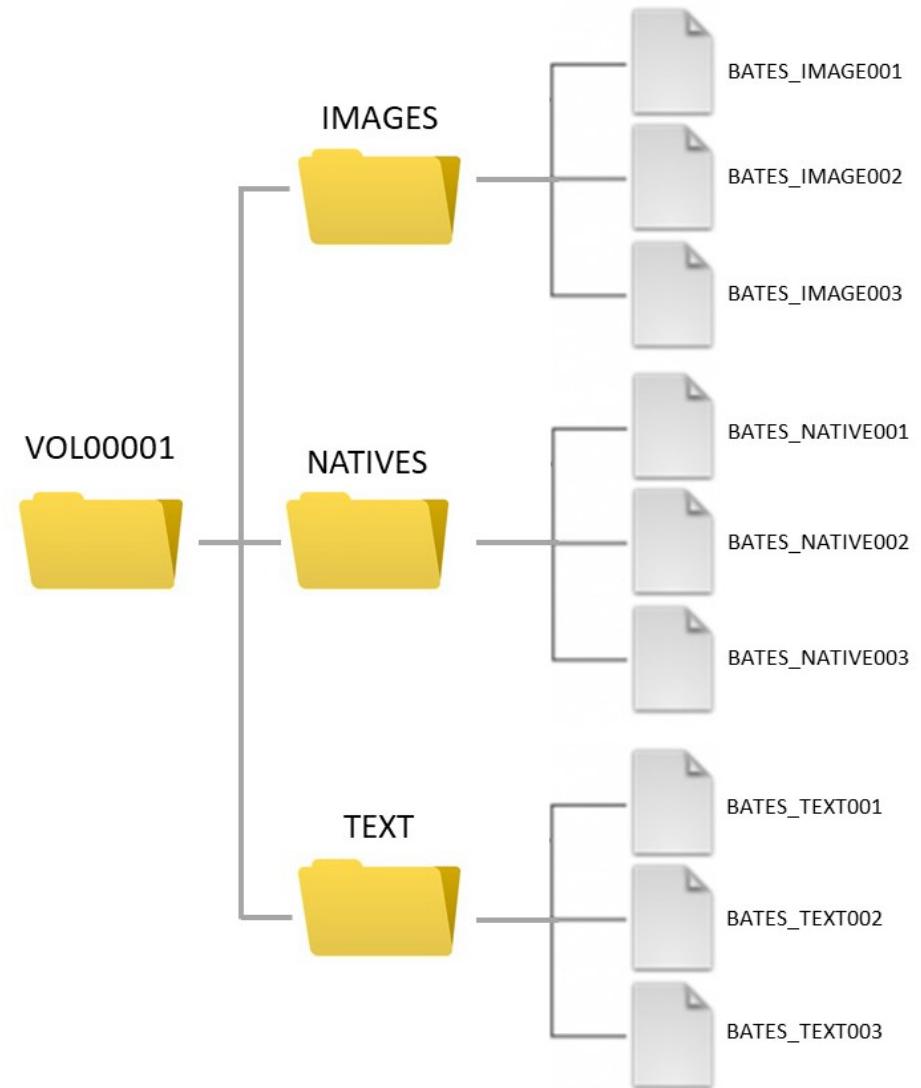
1:205,020 | 117.2802680°W 34.2430851°N

In a simple project like this tutorial it is not that difficult to restore a few links but in the ATSDR GIS project there will be 100's to 1,000's of layers with broken links if the project is produced using ESI methodology.¹⁸

ATSDR Water Model Project

- To rectify this the DOJ wants to provide a “map” of the original folder-subfolder-file structure to allow the plaintiffs to recreate the ARSDR Water Model Project
- The “map” is a listing of the original folder paths and file locations from the ATSDR water Model Project. A sample of which is shown below:

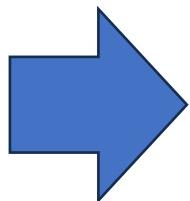
#TYPE Selected.System.IO.DirectoryInfo	FullName
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\Camp Lejeune SVI_20170717.docx
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA Fig13-14.pdf
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA16.pdf
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA17.pdf
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA4.1_TCE HPIA layer1.pdf
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA5.1_benzene HPIA layer1.pdf
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA6.1_TCE HP landfill layer1.pdf
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA6.4_PCE HP landfill layer1.pdf
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA Sup3 FigS3.21_Pot surface.pdf
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA TabA7-8_pot&doc sources.pdf
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChD FigD7-8_Bldg645 benzene USTP.pdf
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\DL4_DRAFT_Camp Lejeune VI Work Plan_modeling and
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\DL4_DRAFT_Camp Lejeune VI Work Plan_modeling and
	E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\Table1_ResultsSummary (002).docx



ATSDR Water Model Project

- To accomplish this the plaintiffs would have to first rename all the bates files back to their original file names using a batch rename process

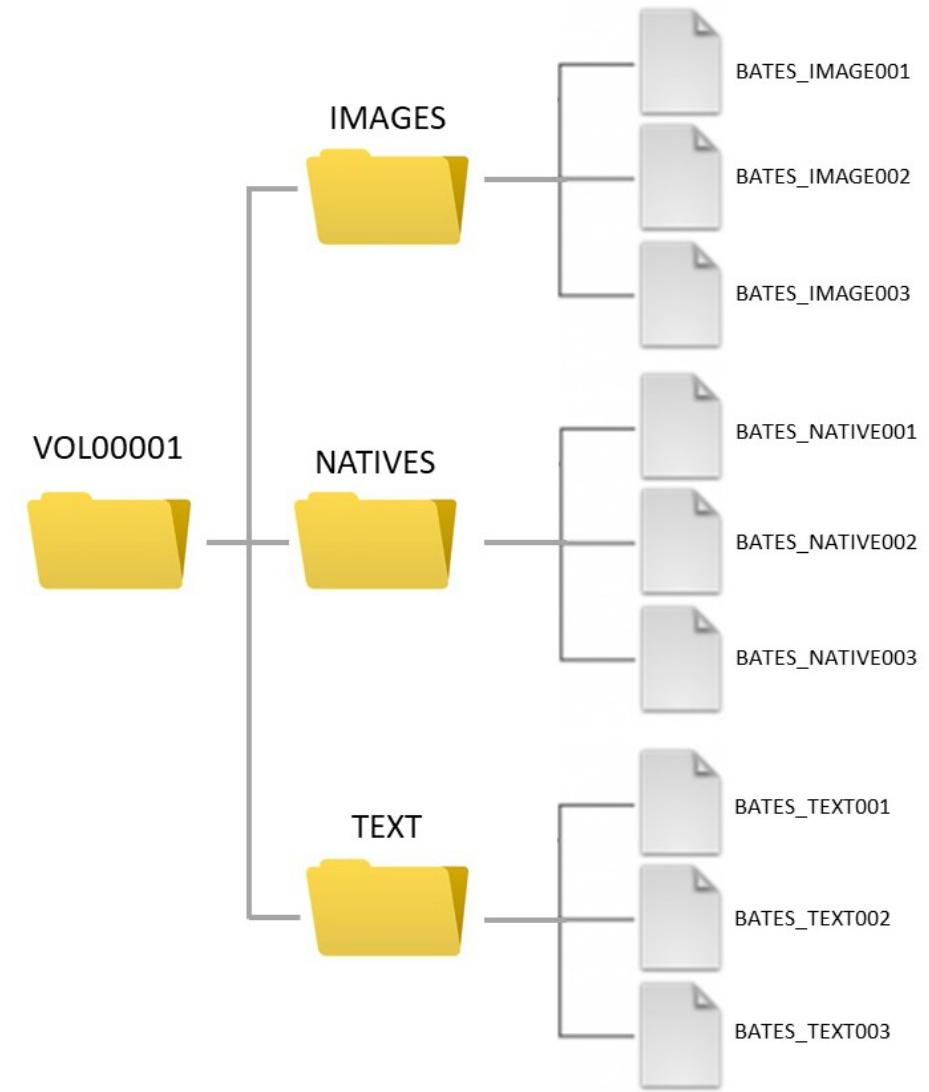
BEGDOC#
CLJA_WATERMODELING-0000000001
CLJA_WATERMODELING-0000000002
CLJA_WATERMODELING-0000000003
CLJA_WATERMODELING-0000000004
CLJA_WATERMODELING-0000000005
CLJA_WATERMODELING-0000000006
CLJA_WATERMODELING-0000000008
CLJA_WATERMODELING-0000000010
CLJA_WATERMODELING-0000000011
CLJA_WATERMODELING-0000000012
CLJA_WATERMODELING-0000000013



Bates File Name

FILENAME
ChA FigA4.1_TCE HPIA layer1.pdf
Table1_ResultsSummary (002).docx
ChA FigA16.pdf
ChA FigA17.pdf
ChA FigA6.1_TCE HP landfill layer1.pdf
ChD FigD7-8_Bldg645 benzene USTP.pdf
ChA Fig13-14.pdf
ChA FigA5.1_benzene HPIA layer1.pdf
Camp Lejeune SVI_20170717.docx
ChA Sup3 FigS3.21_Pot surface.pdf
ChA FigA6.4_PCE HP landfill layer1.pdf

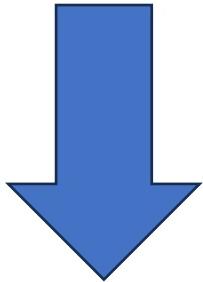
Original File Name



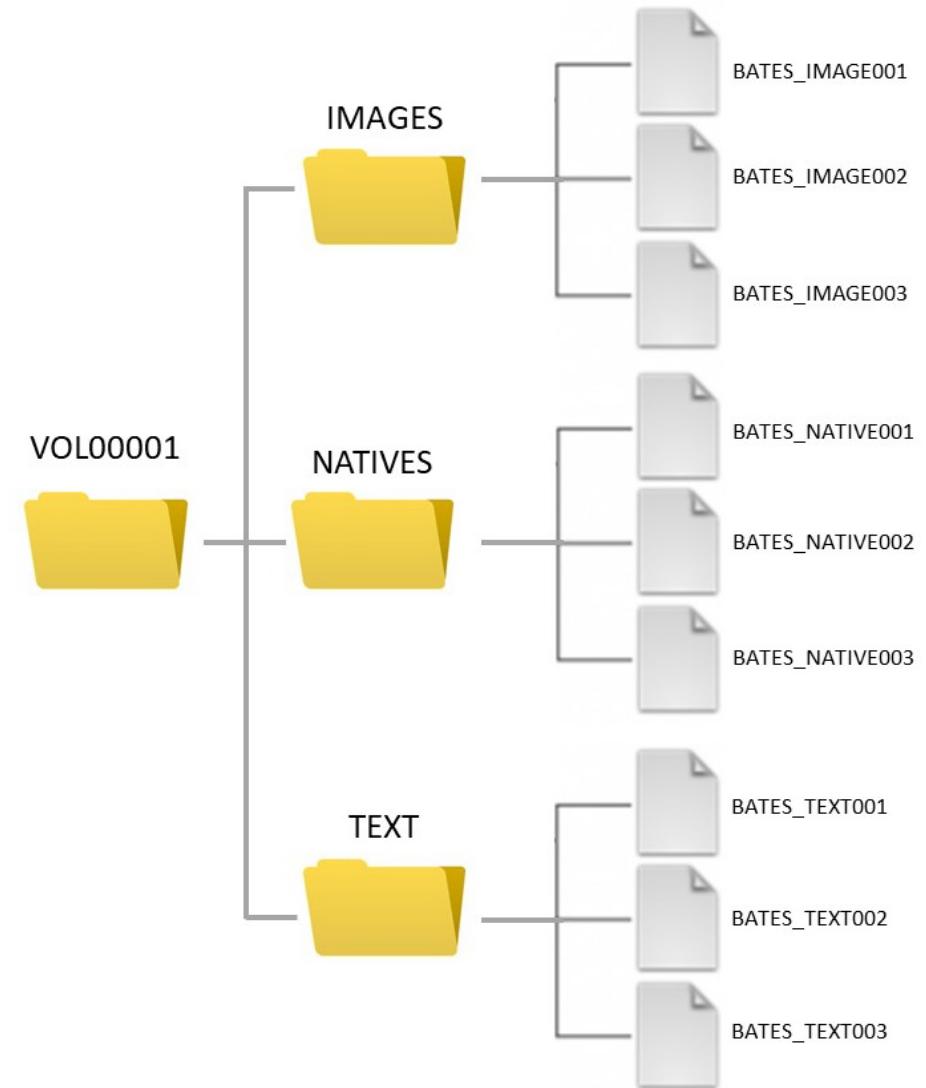
ATSDR Water Model Project

- The next step would be to recreate the folder-subfolder structure of the ATSDR Water Model Project

E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM
E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC
E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion



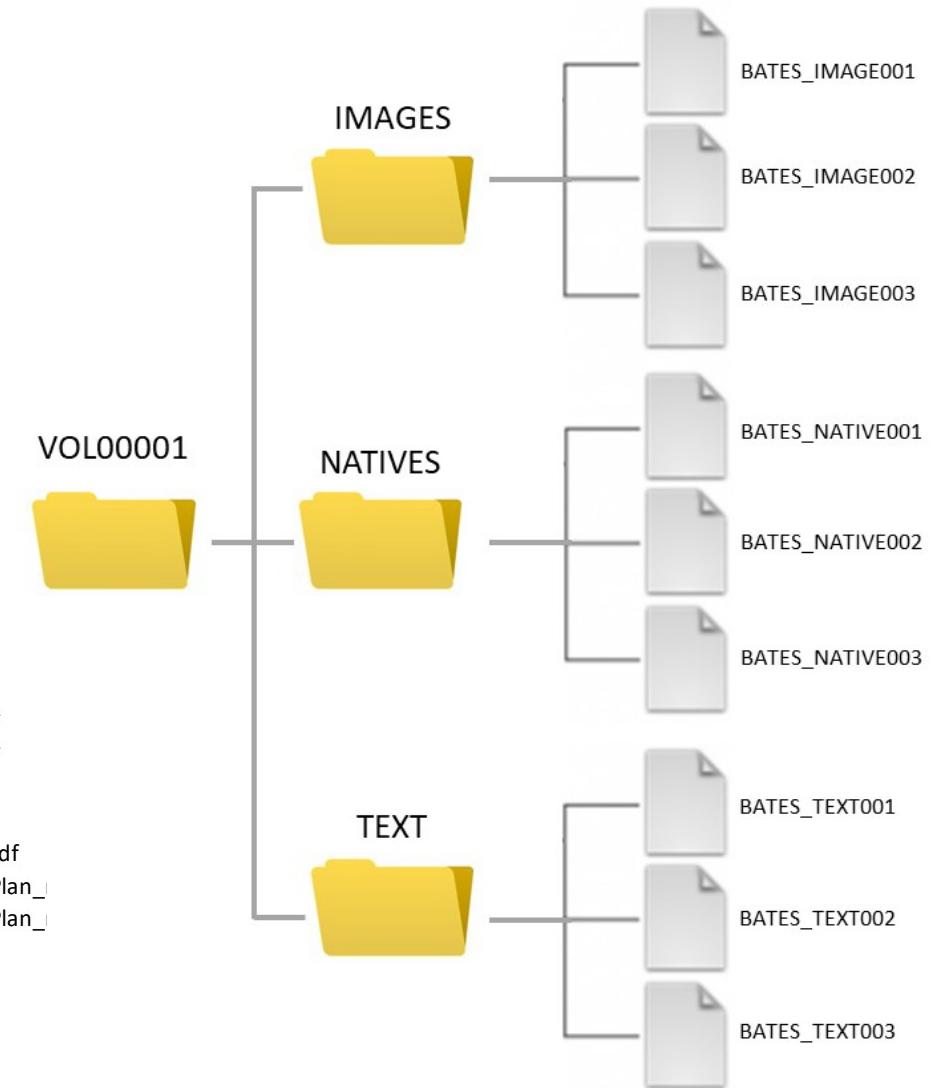
Hundreds to thousands of additional folders-subfolders would have to be recreated through a batch process



ATSDR Water Model Project

- Once the original folder-subfolder structure has been recreated the renamed files would have to be moved to their original location through a batch process

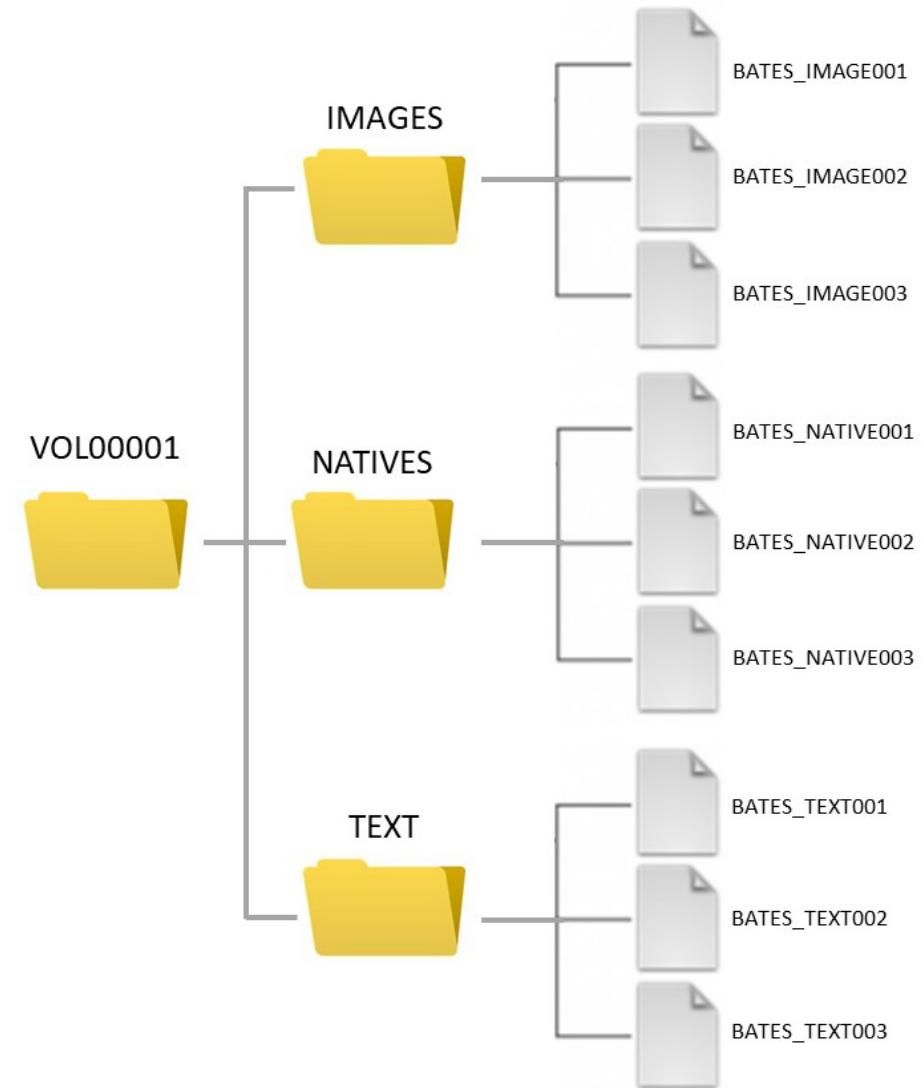
```
E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM  
E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC  
E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion  
E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\Camp Lejeune SVI_20170717.docx  
E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA Fig13-14.pdf  
E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA16.pdf  
E:\2023-014 DOJ\EDRP\CCEHIP_ATSDR_EDRP02\Site_Files_MLM\Camp Lejeune NC\Soil Vapor Intrusion\ChA FigA17.pdf  
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- The project would then have to be tested to verify all native files have been restored

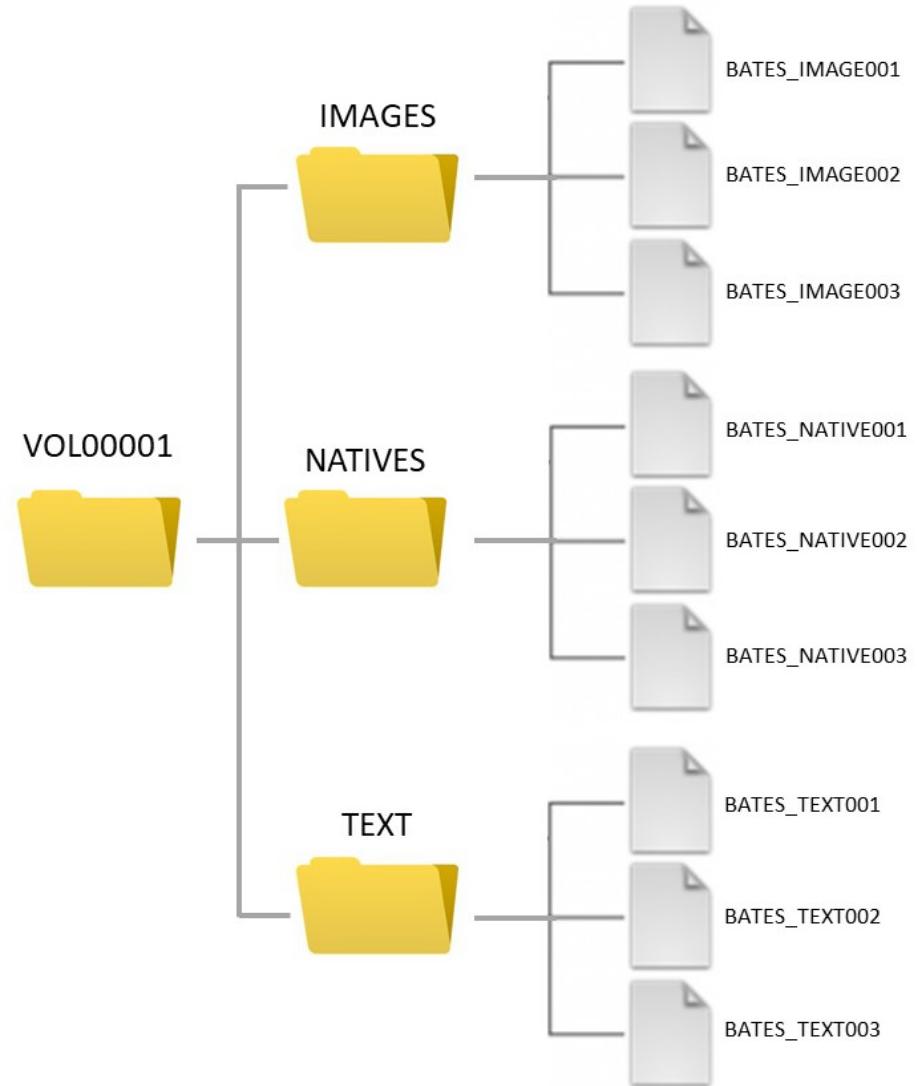
ATSDR Water Model Project

- The plaintiffs are requesting the DOJ to simply clone the ATSDR Water Model Project onto a suitable hard drive and provide that instead of requiring the rebuilding of the entire project through the steps previously outlined.
- The end result is the same: The plaintiffs have a functioning copy of the project and can move forward in their evaluation of the material.
- The difference is that the unnecessary step of having to rebuild the project is eliminated which saves time, reduces cost and eliminates the chance of errors being introduced during the tear down – rebuild process.



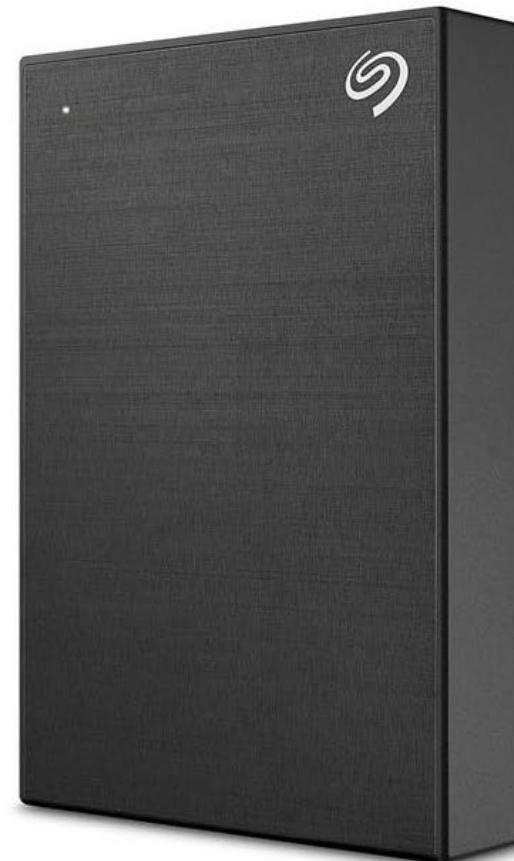
ATSDR Water Model Project

- When asked why they can't clone the project the DOJ raises the issue that if the plaintiffs' experts use the files in the original native format that it will create confusion in a deposition or other similar circumstance.
- But contrary to this they offer the plaintiffs the ability to recreate the original project using their supplied "map" which is the same thing as providing plaintiffs a clone of the project.
- The DOJ fails to acknowledge that the ESI bates version of the project allows both parties to cross reference original file names to the corresponding bates file version.



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